

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE:	§
	§
ENTREC CORPORATION, et al.,	§
	§
<i>Plaintiffs and Counter Defendants,</i>	§
	§
Debtors in a Foreign Proceeding	§
	§
	§
	§
WOLVERINE ENERGY AND INFRASTRUCTURE INC.,	§ CASE NO. 20-32643 § (Chapter 15) § JOINTLY ADMINISTERED
	§
<i>Plaintiff and Counter-Defendant,</i>	§ ADV. No. 20-03455
	§
VS.	§
	§
ENT CAPITAL CORP., ENTREC HOLDINGS INC., ENTREC CRANES & HEAVY HAUL INC., and ENTREC CORPORATION,	§
	§
	§
<i>Defendants and Counter-Plaintiffs.</i>	§
	§

**WOLVERINE ENERGY AND INFRASTRUCTURE, INC.'S WITNESS AND EXHIBIT
LIST FOR THE APRIL 15, 2021 BIFURCATED TRIAL**

Wolverine Energy and Infrastructure, Inc. (“Wolverine”) hereby submits this witness and exhibit list for the April 15, 2021 Bifurcated Trial on the sole issue of whether or not Wolverine performed a field exam, in compliance with the Asset Purchase Agreement, before the Honorable Marvin Isgur, United States Bankruptcy Court for the Southern District of Texas.

WITNESS LIST

Wolverine designates the following entities and individuals who may be called as witnesses at the Bifurcated Trial:

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION	
Main Case No: 20-32643	Name of Debtor: In re ENTREC Corporation, et al.
Adversary No: 20-03455	Style of Adversary: ADV. No. 20-03455; <i>Wolverine Energy and Infrastructure, Inc.</i>
<u>Witnesses:</u>	
Mr. Shannon Ostapovich – fact witness	Judge: Hon. Marvin Isgur
Mr. Jesse Douglas – fact witness	Courtroom Deputy: Tyler Laws
Mr. Nicholas Kieffer – fact witness	Hearing Date: April 15, 2021
Mr. Doug Boulet – fact witness (<i>via</i> deposition)	Hearing Time: 9:30 a.m.
Mr. Jeanine Cable – fact witness (<i>via</i> deposition)	Party's Name: Wolverine Energy and Infrastructure, Inc.
Mr. Jesse Taylor – fact witness (<i>via</i> deposition)	Attorneys' Name: James Rogers and Clarissa Medrano
Mr. John Stevens – fact witness	Attorney's Phone: 713-968-3861 and 956-279-1800
	Nature of Proceeding: Adversary Proceeding

Wolverine reserves the right further reserves all rights to call (i) any witnesses designated by any other party in connection with the Bifurcated Trial; and, (ii) any witness necessary to rebut the testimony of any witness called or designated by any other party. As noted above, Mr. Boulet, Mr. Cable and Mr. Taylor are third party fact witnesses (now employed with Prolift Rigging) and will therefore likely be called *via* their sworn deposition testimony.

EXHIBIT LIST

Ex. #	Description	Offered	Objection	Admitted/ Not Admitted	Disposition
1	The Asset Purchase Agreement CONFIDENTIAL WE/ENTREC000001 - 000060				

2	Plaintiff Wolverine's Inspection Itinerary & Summary CONFIDENTIAL WE/ENTREC000064 - 000067				
3	Plaintiff Wolverine's Photographs Taken During Inspection CONFIDENTIAL WE/ENTREC000068 - 000125				
4	Affidavit of Sabina Mancilla with Exhibits CONFIDENTIAL WE/ENTREC000126 - 000175				
5	September 17, 2020 Correspondence MONITOR_00001367 - _00001368				
6	September 25, 2020 Correspondence MONITOR_00002990				
7	September 29, 2020 Correspondence Re: Formal Notice of Election Pursuant to Clause 2.4... CONFIDENTIAL MONITOR_000066 - 000069				
8	Rouse Appraisals Submission Date: June 18, 2020 WE-ENTREC01820 - 01855				
9	ENTREC Cranes & Heavy Haul Inc. 5/31/2020 Appraisal Detail USD MONITOR_003393 - 003399				
10	Rouse Appraisals Submission Date: August 31, 2020 MONITOR_00003345 - 00003391				
11	ENTREC US 7/31/2020 Appraisal Detail (DRAFT) MONITOR_003392				
12	September 17, 2020 Correspondence to Adam Fowler Re: Insurance Loss History CONFIDENTIAL MONITOR_00001303 - 00001311				
13	September 29, 2020 Correspondence Re: Field Exam / Return of Deposit CONFIDENTIAL MONITOR_0000085				
14	September 25, 2020 Correspondence to Shannon Ostapovich Re: disposal CONFIDENTIAL MONITOR_00003055- 00003056				

15	September 16, 2020 Correspondence to Shannon Ostapovich Re: Asset Verification CONFIDENTIAL MONITOR_00001184				
16	September 25, 2020 Correspondence to Shannon Ostapovich Re: Disposals CONFIDENTIAL MONITOR_00003033				
17	September 11, 2020 Correspondence to Shannon Ostapovich Re: List of trailers CONFIDENTIAL MONITOR_00000877- 00000878				
18	September 20, 2020 Correspondence to Shannon Ostapovich Re: Expedia flight purchase confirmation CONFIDENTIAL MONITOR_00001473 - 00001478				
19	September 20, 2020 Correspondence to Webster Lembke et al Re: Wolverine introduction CONFIDENTIAL MONITOR_00000884				
20	September 17, 2020 Correspondence to Shannon Ostapovich Re: ENTREC Insurance Loss History CONFIDENTIAL MONITOR_00001441 - 00001456				
21	September 22, 2020 Correspondence to Julie Afansiff Re: Rouse Appraisal CONFIDENTIAL MONITOR_0000208 – 0000211				
22	September 22, 2020 Correspondence to John Paul Smith Re: Rouse Appraisal CONFIDENTIAL MONITOR_0000156 – 0000161				
23	September 28, 2020 Correspondence to Joe Brennan Re: Issues Related to Asset Purchase Agreement... CONFIDENTIAL MONITOR_0000061 – 0000065				
24	Deposition Transcript of Richard Hatley Deposition Date: April 1, 2021				

25	Deposition Transcript of John Stevens Deposition Date: March 9, 2021				
26	Shannon Ostapovich Notes CONFIDENTIAL WE-ENTREC003944 - 003950				
27	September 22, 2020 Correspondence to Julie Afansiff Re: Rouse Appraisal CONFIDENTIAL MONITOR_0000156 – 0000161				
28	September 24, 2020 Correspondence to Jesse Taylor Re: Sales list CONFIDENTIAL MONITOR_00002924				
29	Monitor's Responses to Wolverine's Requests for Production and Interrogatories				
30	Plaintiff Wolverine's Amended Interrogatory and Request for Production Responses.pdf				
31	September 22, 2020 Correspondence to Julie Afansiff Re: Rouse Appraisal CONFIDENTIAL MONITOR_0000162 – 0000167				
32	September 17, 2020 Correspondence to Jeanne Cable Re: Canadian registered pickup CONFIDENTIAL MONITOR_00001282				
33	September 24, 2020 Correspondence to Jeanne Cable Re: E-Tec CONFIDENTIAL MONITOR_00001813 - 00001822				
34	September 10, 2020 Correspondence to Shannon Ostapovich Re: Wind Attachment CONFIDENTIAL MONITOR_00000826 - 00000827				
35	September 16, 2020 Correspondence to Shannon Ostapovich Re: Asset Verification CONFIDENTIAL MONITOR_00001166				

36	September 16, 2020 Correspondence to Shannon Ostapovich Re: Asset Verification CONFIDENTIAL MONITOR_00001188 - 00001189				
37	September 29, 2020 Correspondence to Julie Afanasiff Re: Field Exam / Return of Deposit WE-ENTREC01452-01455				
38	Deposition Transcript of Jesse Taylor Deposition Date: March 10, 2021				
39	Deposition Transcript of Doug Boulet Deposition Date: March 10, 2021				
40	Deposition Transcript of Jeanne Cable Deposition Date: March 11, 2021				
41	Deposition Transcript of Nikolaus G. P. Kiefer Deposition Date: March 12, 2021				
42	Deposition Transcript of John Stevens Deposition Date: March 9, 2021				

Wolverine reserves all rights to amend or supplement this exhibit list at or prior to the Bifurcated Trial. Wolverine further reserves all rights to offer into evidence any exhibits designated by any other party. Additionally, Wolverine further reserves all rights to use exhibits not listed herein for impeachment purposes at the Bifurcated Trial.

Dated: April 6, 2021

Respectfully submitted,

By:/s/ James E. Rogers
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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that a true and correct copy of the foregoing document was served by the electronic case filing system on April 6, 2021, including the Debtors, their counsel, the U.S. Trustee and parties requesting notice by electronic case filing system.

/s/ James E. Rogers

James E. Rogers